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8 *Attorneys for Jeremy E. Sigal*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 JEREMY E. SIGAL, an individual,
12
13 Plaintiff,

Case No. 2:20-cv-00755-RFB-DJA

14 v.

**STIPULATION AND ORDER TO
CONTINUE BRIEFING DEADLINES**

15 WENDY REMMERS, an individual;
16 SERGEANT NEDZA, an individual;
17 MICHAEL SWEETEN, an individual;
18 LIEUTENANT JACKSON, an
19 individual; SHELLEY CARRAO, an
20 individual; ANNE CARPENTER, an
21 individual; OFFICER NORDGREN, an
22 individual; OFFICER WOODWARD, an
23 individual; BRIAN WILLIAMS, an
24 individual; JENNIFER NASH, an
25 individual; JEREMY BEAN, an
26 individual; HUBBARD-PICKETT, an
27 individual; CCS TERNES MANUEL
28 PORTILLO, an individual; DWAYN
DEAL, an individual; DOES I through X
and ROE CORPORATIONS I through X,
inclusive.

Defendant.

Plaintiff Jeremy E. Sigal ("Plaintiff", by and through the undersigned counsel, DPS
Defendants¹, by and through their undersigned counsel, DFS² Defendants, by and

¹ DPS Defendants consist of the following Defendants: (a) Anne Carpenter; (b) Michael Sweetn; (c) Shelly Carrao; and (d) Michelle Jackson.

² NDOC Defendants consist of the following Defendants: (a) Jennifer Nash; (b) Manuel Portillo; and (c) Troy Ternes; (d) Jeremy Bean; (e) Brian Williams; (f) Monique Hubbard-Pickett; and (g) Dwayne Deal.

1 through their undersigned counsel respectfully submit this Stipulation to Continue
2 Briefing Deadlines as follows:

- 3 1. DPS Defendants filed a Motion to Dismiss the Complaint [ECF 17] on June 7,
4 2021.
- 5 2. NDOC Defendants filed Defendants' Motion to Dismiss [ECF 18] on June 24, 2021.
- 6 3. The response to the DPS Defendants Motion to Dismiss is presently due on June
7 21, 2021 and the response to NDOC Defendants Motion to Dismiss is presently
8 due on July 8, 2021.
- 9 4. Pursuant to LR IA 6-1(a), the Parties submit the following statement of excusable
10 neglect as it pertains to the request to extend the response deadline to the DPS
11 Defendants Motion to Dismiss. On or about June 17, 2021, Plaintiff's Counsel's
12 office had a computer and server crash on their case files that resulted in a
13 temporary loss/interruption of data and in some cases a permanent loss of data as
14 to case files and calendaring software. Plaintiff's Counsel and the staff spent that
15 day and the corresponding weekend recovering data and attempting to re-
16 calendar case deadlines and calendars. This software/data problem resulted in
17 interruption and problems in other cases as well. The briefing deadline for the
18 response in this matter as well as the file for the instant matter was only recovered
19 by Plaintiff's Counsel's office after the stated June 21, 2021 deadline. Plaintiff's
20 Counsel's office extends sincere apologies to the Court, opposing counsel and those
21 affected. Plaintiff's Counsel has been a practitioner in the federal courts for well
22 over ten years now and has never had any issue with motion practice deadlines to
23 date with the exception of the above incident.
- 24 5. The Parties have conferred and agree for the purpose of efficiency, judicial
25 economy, and due to the scheduling issues of the parties, travel plans, the trial
26 schedule of the Parties, and the intermittent holiday, that Plaintiff shall have up
27 and until Monday July 12, 2021 to submit responses to both the DPS and NDOC's
28

1 Motions to Dismiss. Defendants shall have up and until July 30, 2021 to submit
2 reply points and authorities in support of the Motions to Dismiss.

3 6. This stipulation does not affect any other pre-trial and/or scheduling dates and
4 there is no hearing date currently scheduled on any pending motion.

5 Dated this 6th day of July 2021

6 Schwab Law Firm PLLC

7 /s/ Evan Schwab

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14 *Attorneys for Plaintiff Jeremy Sigal*

15 Nevada Attorney General's Office

16 /s/ Katlyn M. Brady

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23 *Attorneys for NDOC Defendants*

Dated this 6th day of July 2021

Nevada Attorney General's Office

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Attorneys for DPS Defendants

24 ORDER


25 Pursuant to the parties' stipulation, the Court makes the following order:

26 The deadline to file Response to the DPS Defendants Motion to Dismiss [ECF 17] and
27 the NDOC Defendants Motion to Dismiss [ECF 18] shall be continue to July 12, 2021.

28 The Defendants shall have up and until July 30, 2021 to file reply points and
authorities in support of their Motions.

IT IS SO ORDERED.

Dated this 8th day of July 2021


RICHARD E. BOULWARE, II
United States District Court